

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

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JOHN E GREANEY (AND WIFE, ANDREA
GREANEY)

21 MC 103

07CV5410

Plaintiffs,

-against-

ON-SITE

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING,
INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL
NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT,
INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY
CORTESE SPECIALIZED HAULING LLC.; ATLANTIC HEYDT
CORP.; BECHTEL ASSOCIATES PROFESSIONAL
CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL
CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEL
& COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING
& CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.;
BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-
FOUR TRANSPORTATION CORP.; BURO HAPPOLD
CONSULTING ENGINEERS, P.C.; C.B. CONTRACTING CORP;
CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO.,
INC.; DAKOTA DEMO-TECH; DIAMOND POINT EXCAVATING
CORP ; DIEGO CONSTRUCTION, INC.; DIVERSIFIED CARTING,
INC.; DMT ENTERPRISE, INC. D'ONOFRIO GENERAL
CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL
SUPPLY, INC.; EAGLE ONE ROOFING CONTRACTORS INC;
EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING
OF CORONA (EROC); EWELL W. FINLEY, P.C.; EXECUTIVE
MEDICAL SERVICES, P.C.; FLEET TRUCKING, INC.; FRANCIS
A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC.;
GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES
CONSULTING ENGINEERS, PLLC.; HALLEN WELDING SERVICE,
INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA
CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING
CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING
ENGINEERS P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD,
KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV
OF THORTON TOMASETTI; MANAFORT BROTHERS
INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSUN MERIDIAN
CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.;

MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, P.C; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALA MANDRE & SONS, INC.; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC.; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIV AIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC.; TORETTA TRUCKING, INC.; TOTAL SAFETY CONSULTING, LL.C.; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC.; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VERIZON NEW YORK INC; VOLLMER ASSOCIATES LLP, WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC.; WSP CANTOR SEINUK; YANNUZZI & SONS, INC; YONKERS CONTRACTING COMPANY, INC.; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.;

OFF-SITE

ALAN KASMAN DBA KASCO, AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., ANN TAYLOR STORES CORPORATION, BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC., BFP TOWER C CO. LLC., BFP TOWER C MM LLC, BLACKMON-MOORING-STEAMATIC, CATASTROPHE, INC. D/B/A BMS CAT, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., ENVIROTECH CLEAN AIR, INC., FGP 90 WEST STREET INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC., INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., KIBEL COMPANIES, LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC., MCCLIER CORPORATION, MERRILL LYNCH & CO, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC.,

NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA,
STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES,
INC., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA
CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA
CONDOMINIUM (CONDO #1178), TOSCORP INC., TRAMMELL CROW
COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC.,
TUCKER ANTHONY, INC., VERIZON COMMUNICATIONS, INC.,
VERIZON NEW YORK, INC, VERIZON PROPERTIES, INC., WESTON
SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE
LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL
CO. L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A.
CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP,
WFP TOWER B. CO., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL
Defendants.

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**ENVIROTECH CLEAN AIR'S ANSWER TO CHECK OFF COMPLAINTS
RELATED TO THE MASTER COMPLAINTS**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.
("Envirotech"), as and for their responses to the allegations set forth in the Complaint by
Adoption ("Check-off Complaint") related to the Master Complaints filed in the 21 MC
100 and 21 MC 102 actions, hereby adopts Envirotech's Answer to the Master Complaint
dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower
Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the
above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
May 23, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
Attorneys for Defendant -Envirotech
3000 Marcus Avenue, Suite 2E1
Lake Success, New York 11042
(516) 775-5800

BY: 
Heather L. Smar (4622)